

James David Jacobs (JJ-7351)
Frank M. Gasparo (FG-2958)
Todd S. Sharinn (TS-0581)
BAKER & McKENZIE LLP
1114 Avenue of the Americas
New York, New York 10036
(212) 626-4100
Attorneys for Defendant Oberthur Card Systems, S.A.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

LEIGHTON TECHNOLOGIES LLC,

Plaintiff and Counterclaim Defendant,

v.

OBERTHUR CARD SYSTEMS, S.A.,

Defendant and Counterclaim Plaintiff.

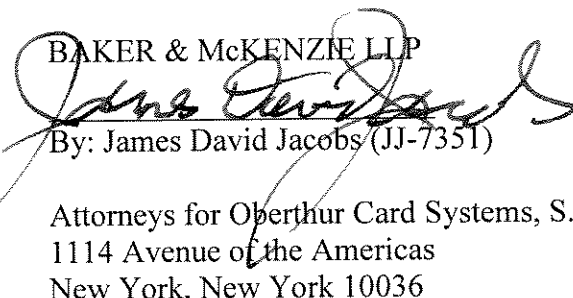
04 Civ. 02496 (CM)(LMS)

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law dated April 7, 2006, Defendant Oberthur Card Systems, S.A. ("Oberthur") will move this Court, at the United States Courthouse, 300 Quarropas Street, Room 533, White Plains, New York, 10601, at a date and time to be determined by the Court, before the Honorable Colleen McMahon, for an order setting aside the Magistrate Judge's order dated March 27, 2006, and ordering plaintiff to produce communications between Keith Leighton and his patent counsel, along with the patent counsel's work product. This motion is brought pursuant to Rule 72(a) of the Federal Rules of Civil Procedure.

Dated: New York, New York
April 7, 2006

BAKER & MCKENZIE LLP


By: James David Jacobs (JJ-7351)

Attorneys for Oberthur Card Systems, S.A.
1114 Avenue of the Americas
New York, New York 10036
(212) 626-4100

Of Counsel:
James David Jacobs
Frank M. Gasparo
Todd S. Sharinn